

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ARTHUR DOE, *et al.*,

Plaintiffs,

v.

**JIM HOOD, Attorney General of the
State of Mississippi, *et al.*,**

Defendants.

Case No. 3:16-cv-00789-CWR-FKB

PLAINTIFFS' UNOPPOSED MOTION TO AMEND PROTECTIVE ORDER

Plaintiffs respectfully make this unopposed motion to the Court to amend the protective order as follows:

1. This Court entered a Protective Order jointly agreed-upon by Defendants and Plaintiffs on September 20, 2017 (Dkt. No. 53). Paragraph 3 of the Protective Order provided for Plaintiffs to file certain documents submitted in support of Plaintiffs' summary judgment motion under restricted access, pursuant to the June 2, 2017 order of Judge Reeves (Dkt. No. 43). The documents in question had been filed in redacted form as Dkt. Nos. 17 and 17-1-5.
2. Plaintiffs filed unredacted versions of the relevant documents under restricted access on September 20, 2017. (Dkt No. 54). Although the Protective Order was intended by both parties to grant access only to Plaintiffs' counsel, Defendants' counsel, and a small number of individuals identified by Defendants as necessary to mount a defense to the lawsuit, filing these documents under restricted access gave counsel for *amici curiae*, who had submitted a brief in support of Plaintiffs' motion for summary judgment, access to confidential information.

3. The docketing clerk has advised Plaintiffs' counsel that restricted access allows for any counsel associated with the case to obtain restricted documents. Counsel for *amici curiae* have represented to Plaintiffs' counsel that they have not and will not access these documents. Nonetheless, both Plaintiffs' and Defendant's counsel wish to prevent any inadvertent disclosure of confidential information.

4. Plaintiffs therefore respectfully seek to amend the protective order so that documents currently filed under restricted access are instead filed under seal.

5. Defendants have consented to this request.

WHEREFORE, Plaintiffs respectfully move this Court for permission to amend the protective order to seal the documents now filed under restricted access.

Date: September 26, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Ghita Schwarz, hereby certify that a true and correct copy of the foregoing document was filed electronically on September 26, 2017. Notice of this filing will be sent by email to all parties through the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF filing system.

/s/ Ghita Schwarz

Ghita Schwarz, *pro hac vice*